

**United States of America
Before the National Labor Relations Board
Region 21**

Mason-Dixon Intermodal d/b/a Universal
Intermodal Services

Respondent,

and

Mason-Dixon Intermodal d/b/a Universal
Intermodal Services and Southern Counties
Express, Inc.

Respondent,

and

Roadrunner Intermodal Services, LLC

Respondent,

and

Universal Truckload, Inc.,

Respondent,

and

International Brotherhood of Teamsters,
Charging Party.

CASE NO. 21-CA-252500
21-CA-252574
21-CA-264164
21-CA-253662
21-CA-259130
21-CA-254813
21-CA-255151

**Opposition to Request for Appointment
of Settlement Judge**

Charging Party International Brotherhood of Teamsters respectfully opposes the request by Respondents dated April 19, 2021 for appointment of a settlement judge pursuant to section 102.35(b) of the Board's Rules and Regulations. While Charging Party agrees that Respondents and Charging Party have engaged in good-faith attempts at a potential settlement and that such a settlement may be reached, Charging Party respectfully disagrees that appointment of a settlement judge is a valuable use of the

resources of the agency or of the parties due to the significant investment of time that would be required for the parties, including the representatives of Region 21—who have been enmeshed in the details of this case for close to a year and a half—to get a settlement judge up to speed on the entire matter as well as the discussions the parties have already had to date toward settlement. If a settlement, whether Board or non-Board, is feasible in this matter, Charging Party has every confidence that the parties will be able to reach it on their own.

Dated this 23rd day of April, 2021.

By: *s/ Jason Wojciechowski*

JULIE GUTMAN DICKINSON

JASON WOJCIECHOWSKI

HECTOR DE HARO

BUSH GOTTLIEB

801 North Brand Boulevard, Suite 950

Glendale, California 91203-1260

Telephone: (818) 973-3200

Facsimile: (818) 973-3201

Attorneys for International Brotherhood of
Teamsters

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 801 North Brand Boulevard, Suite 950, Glendale, CA 91203-1260.

On April 23, 2021, I served true copies of the following document(s) described as **OPPOSITION TO REQUEST FOR APPOINTMENT OF SETTLEMENT JUDGE** on the interested parties in this action as follows:

SERVICE LIST

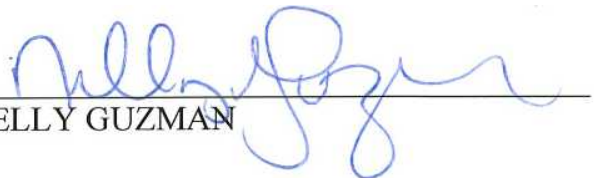
Phuong Do **VIA EMAIL**
312 N Spring Street, 10th Floor
Los Angeles, CA 90012-4701
Email: Phuong.Do@nlrb.com

Daniel A. Adlong **VIA EMAIL**
OGLETREE DEAKINS NASH
SMOAK & STEWART, PC
Park Tower, Fifteenth Floor
695 Town Center Drive
Costa Mesa, CA 92626
Email: daniel.adlong@ogletree.com

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address nguzman@bushgottlieb.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 23, 2021, at Arleta, California.


NELLY GUZMAN